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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JOSEPH BORDONARO,

Plaintiff,

v.

NAVIENT SOLUTIONS, INC.,

Defendant.

Case No. 2:18-cv-02320-APG-GWF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR NAVIENT
SOLUTIONS, LLC TO FILE AN
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Plaintiff JOSEPH BORDONARO ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC. f/k/a NAVIENT SOLUTIONS, INC. ("NSL"), by and through their respective counsel, stipulate and agree to extend the deadline from December 28, 2018 to January 11, 2019, for NSL to File an Answer or Otherwise Respond to Plaintiff's Complaint (ECF No. 1).

On December 6, 2018, Plaintiff filed his Complaint. The claims at issue necessitate additional time for fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so that it can meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action, and therefore requires additional time to investigate the allegations and claims asserted against NSL. Plaintiff has no opposition to NSL's request for an extension until January 11, 2019 to file an answer or otherwise respond to Plaintiff's Complaint.

1 This is the first stipulation for extension of time for NSL to respond to Plaintiff's Complaint
2 and is being made in good faith and not for purposes of undue delay. No additional requests for
3 extensions are contemplated.

4 **IT IS SO STIPULATED.**

5 Dated this 20th day of December 2018.

6 **HOLLEY, DRIGGS, WALCH, FINE,
7 PUZEY STEIN & THOMPSON**

8 /s/ Michael R. Ayers

9 JAMES W. PUZEY, ESQ.
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Attorneys for Defendant
NAVIENT SOLUTIONS, LLC

13 Dated this 20th day of December 2018.

14 **HAINES & KRIEGER, LLC**

15 /s/ David H. Krieger

16 DAVID H. KRIEGER, ESQ.
17 8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Attorneys for Plaintiff

18 **ORDER**

19 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up
20 to and including January 11, 2019 is so ORDERED AND ADJUDGED.

21 Dated this 21st day of December, 2018.

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23 UNITED STATES MAGISTRATE JUDGE
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